

**EPA Registration File No.
90057-1**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 14, 2015

SHP Chemical Inc.
311 West Third Street, Suite 212-2808
Carson City, NV 89703

c/o

Leslie Garcia, Technology Sciences Group, Inc.
Regulatory Agent to SHP Chemicals

Subject: Notification per PRN 98-10 – Clarify Directions for Use
Product Name: SHP Chemical Imidacloprid Technical
EPA Registration Number: 90057-1
Application Date: 4/27/2015
Decision Number: 504022

Dear Ms. Garcia:

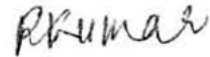
The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the request is not acceptable for the following reasons:

1. A change was made in the Precautionary Statements which was not identified. Changes to precautionary statements cannot be made with a notification.
2. The Net Contents was changed from 440 lbs to 400 lbs, which is an incorrect conversion from 200 kg. Again, this change was not identified.
3. The deleted uses under Directions for Use were not identified.

As a reminder, the certification statement conveys, "Violations may be subject to enforcement action". No further processing of this application will occur. Our records have been updated accordingly to note that this notification is unacceptable.

If you have any questions, you may contact Rita Kumar at (703) 308-8291 or via email at kumar.rita@epa.gov.

Sincerely,



Venus Eagle, Product Manager 01
Invertebrate and Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs



Technology Sciences Group Inc.

712 Fifth Street, Suite A
Davis, CA 95616
Direct: (530) 757-1211
Fax: (530) 757-1299
E-Mail: lgarcia@TSGUSA.com

Leslie C. Garcia
Senior Regulatory Consultant

April 27, 2015

Ms. Venus Eagle, PM 01
Registration Division (IVB3)
Office of Pesticide Programs (7504P)(NOTIF)
U.S. Environmental Protection Agency
Document Processing Center
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Re: Notification to Clarify/Delete Directions for Use
Company Name: SHP CHEMICAL INC.
Product Name: SHP CHEMICAL IMIDACLOPRID TECHNICAL
EPA Reg. No.: 90057-1

Dear Ms. Eagle,

Technology Sciences Group, Inc., on behalf of SHP Chemical, Inc., herein submits the enclosed notification to delete previously accepted language to clarify the product use to the aforementioned product label. Please find enclosed the following documents supporting this notification:

- 1) Form 8570-1, EPA Application Form;
- 2) One redline copy of the proposed label with changes indicated;
- 3) ~~One~~ (1) clean copy of the proposed label.

If you have any questions or require additional information or clarification, please do not hesitate to contact me at (530) 757-1211 or email lgarcia@TSGUSA.com.

Sincerely,

Leslie Garcia, Agent for SHP Chemical Inc.



Enclosures

CC: C. Miller, SHP

Washington, D.C.
1150 18th St., NW, Suite 1000
Washington, D.C. 20036
Phone: (202) 223-4392

California
712 Fifth St., Suite A
Davis, CA 95616
Phone: (530) 757-1245

Canada
275 Slater St., Suite 900
Ottawa, Ontario K1P 5H9
Phone: (613) 447-6485

		United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section I					
1. Company/Product Number 90057-1		2. EPA Product Manager Venus Eagle		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
4. Company/Product (Name) SHP Chemical Inc. / SHP Imidacloprid Technical		PM# 01			
5. Name And Address Of Applicant (Include ZIP Code) SHP Chemical Inc. 311 West Third Street, Suite 212-2808 Carson City, NV 89703 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____			
Section II					
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Notification – Explain below. <input type="checkbox"/> Other – Explain Below.					
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Clarify registered use per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.					
Section III					
1. Material This Product Will Be Packaged In:					
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					
Section IV					
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Leslie Garcia, Technology Sciences Group, Inc.		Title Regulatory Consultant		Telephone No. (Include Area Code) (530) 757-1211	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Agent to SHP Chemical, Inc.			
4. Typed Name Leslie Garcia		5. Date April 27, 2014			

REDLINE

Notification
not accepted

SHP IMIDACLOPRID TECHNICAL
FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.....99.16%

OTHER INGREDIENTS 0.84%

TOTAL 100.00%

KEEP OUT OF REACH OF CHILDREN
WARNING

FIRST AID	
If swallowed	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30am to 4:30pm PST (NPIC Web site: www.npic.orst.edu) for medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat symptomatically.	

See side/**back** panel for additional precautionary statements and directions for use.

EPA Reg. No. 90057-1

EPA Establishment No. _____

Net Weight: 400 lbs (200 kg)

Manufactured For:
SHP CHEMICAL INC.
311 West Third Street
Suite 212-2808
Carson City, NV 89703

See reg. 90057-1
may affect
identity
this
change

Precautionary Statements
Hazard to Humans and Domestic Animals
WARNING

May be harmful if swallowed. Harmful if inhaled. Avoid breathing dust. Wear long-sleeved shirts and long pants, shoes, socks, and chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

USER SAFETY RECOMMENDATIONS: User should wash hands before eating, drinking, using tobacco, or using the toilet. User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to the discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is for use only for manufacturing insecticide formulations for use on Residential Indoor, Companion Animals. Formulators using this product are responsible for obtaining EPA registration for their formulated product.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry place away from food, drink and animal feed. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements). Residual surface material may be removed with towels moistened with methanol.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides, and bottom to loosen clinging particles. When completely dry, offer for recycling, if available, or dispose of liner in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke. If drum is contaminated and cannot be reused, dispose of in the manner required for its liner.

WARRANTY

SHP CHEMICAL INC. warrants that this product conforms to the chemical description on the label. SHP CHEMICAL INC. neither makes nor authorizes any agent or representative to make any other warrant of fitness of merchantability, guarantee or representation, express, or implied concerning this product. To the extent consistent with applicable law, SHP CHEMICAL INC.'s maximum liability for breach of this warranty shall not exceed the purchase price of the product. To the extent consistent with applicable law, buyer and use acknowledge and assume all risks and liabilities resulting from handling, storage, and use of this product which extend beyond the use of this product under normal conditions with the statements on this label.

J&T Associates LLC

4061 North 156th Drive, Goodyear, AZ 85395

Iain Weatherston, Ph.D.

Director

623-535-4055/623-317-9013

E-mail: iweatherston@cox.net

Venus Eagle, Product Manager (1)
U.S. EPA – OPP [7505-P]
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

January 26, 2015

SUBJECT: Response to Agency letter dated August 28, 2014 regarding conditional registration of SHP Imidacloprid Technical

COMPANY: SHP Chemical Inc.
311 West Third Street, Suite 212-2802
Carson City, NV 89703

CONTACT: Iain Weatherston, Ph.D, J&T Associates LLC
[contact information as per letterhead]

PRODUCT: SHP Imidacloprid Technical [EPA Reg. No. 90057-1]

Dear Ms. Eagle:

As agent for, and on behalf of SHP Chemical Inc., I submit for your review a final printed label for SHP Imidacloprid Technical. This action is in response to Agency letter dated August 28, 2014 (copy attached).

In addition to this letter, this application contains:

- A fully executed application for pesticide registration [8570-1]
- Current SAL (1 hard copy)
- Final printed label (1 hard copy)

Should you have any questions or further information is required, please do not hesitate to contact me.

Sincerely,

 MEGHA EVEN for
Iain Weatherston, Agent for SHP Chemical Inc.



United States

Environmental Protection Agency
Washington, DC 20460

Registration
Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 90057-1	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SHP Chemical Inc. / SHP Imidacloprid Technical	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) SHP Chemical Inc. 311 West Third Street, Suite 212-2802 Carson City, NV 89703 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated August 28, 2014
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Notification per PR Notice 98-10.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name IAIN WEATHERSTON		Title Agent, SHP Chemical Inc.		Telephone No. (Include Area Code) 623-535-4055	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent, SHP Chemical Inc.			
4. Typed Name IAIN WEATHERSTON		5. Date January 26, 2015			

SHP IMIDACLOPRID TECHNICAL

FOR MANUFACTURING USE ONLY

reviewed
3/3/2015 Jm

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.....99.16%

OTHER INGREDIENTS:.....0.84%

TOTAL:.....100.00%

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
If swallowed	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30am to 4:30pm PST (NPIC Web site: www.npic.orst.edu) for medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat symptomatically.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

May be fatal if swallowed. Harmful if inhaled. Avoid breathing dust. Wear long-sleeved shirt and long pants, socks, shoes and chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

USER SAFETY RECOMMENDATIONS: User should wash hands before eating, drinking, using tobacco, or using the toilet. User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. Wash outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Formulators using this product are responsible for obtaining EPA registration for their formulated product.

Only for formulation into an insecticide for the following uses:

- Residential Indoor: Companion Animal
- Uses for which the U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
- Uses for experimental purposes that are in compliance with U.S. EPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place away from food, drink and animal feeding stuffs. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements). Residual surface material may be removed with towels moistened with methanol.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. When completely empty, offer for recycling, if available, or dispose of liner in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke. If drum is contaminated and cannot be reused, dispose of in the manner required for its liner.

WARRANTY

SHP Chemical Inc. warrants that this product conforms to the chemical description on the label. SHP Chemical Inc. neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, express or implied, concerning this product. To the extent consistent with applicable law, SHP Chemical Inc.'s maximum liability for breach of this warranty shall not exceed the purchase price of the product. To the extent consistent with applicable law, buyer and user acknowledge and assume all risks and liabilities resulting from handling, storage and use of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.

EPA Reg No. 90057-1

EPA Est. No. 83158-CHN-001

NET WEIGHT: 440 lbs [200 kg]

MANUFACTURED FOR:
SHP Chemical Inc.
311 West Third Street
Suite 212-2802
Carson City, NV 89703

DATA EXTRACTION REQUEST

Reg # 90057-R

Decision # _____

Description: _____

Material Sent:

☒ Electronic Label/Letter Dated 8/28/14
(See PPLS for electronic file)

☐ Stamped Label Dated _____ (See jacket)

☐ Notification Dated _____ (See jacket)

☒ New CSF(s) Dated _____ (See jacket)

☐ Other: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Autumn Metzger

Division: RD - IRB

Phone: 305-5314

Date: 9/9/14



NEW APPLICATIONS

DATE: NOV - 1 2013

FILE REG NUMBER: 90057-R

FEP (OPPIN ENTRY) LV NOV - 4 2013

(Initial & Date)

FILE ROOM: _____

(Initial & Date)

SIG: _____

(Initial & Date)

FILE ROOM: _____

(Initial & Date)

ASSIGN TO PM: AD ✓ RD 1 BPPD _____

JACKET TO SHELF (DATA)

Similarity Clinic R333, citing product in Box 6
"at all" for patent too, generic



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505C)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

90057-1

Date of Issuance:

08/28/14

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

SHP Imidacloprid Technical

Name and Address of Registrant (include ZIP Code):

SHP Chemical Inc.
4061 North 156th Drive
Goodyear, AZ 85395

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data. You must comply with GDCI-129099-951 issued on 11/10/2010. If you have questions about the Generic DCI issued, you may contact the Pesticide Re-evaluation Division.
2. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No. 90057-1."

Signature of Approving Official:

Venus Eagle, Product Manager 01
Insecticide-Rodenticide Branch, Registration Division (7505P)

Date: 08/28/14

3. Submit Storage stability (830.6317) and corrosion characteristics (830.6320) data within 18 months from the date of this registration notice.
4. Submit one copy of the revised final printed label for the record before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. If you have any questions, please contact Autumn Metzger at 703-305-5314 or metzger.autumn@epa.gov.

A stamped copy of the label is enclosed for your records.

Venus Eagle
Product Manager 01
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

08/28/2014

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 90057-1

SHP IMIDACLOPRID TECHNICAL

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.....99.16%

OTHER INGREDIENTS:0.84%

TOTAL.....100.00%

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30am to 4:30pm PST (NPIC Web site: www.npic.orst.edu) for medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat symptomatically.	

See side panel for additional precautionary statements and directions for use.

EPA Reg No. 90057-R

EPA Est. No. xxxxx-xxx-xxx

NET WEIGHT: 440 lbs [200 kg]

MANUFACTURED FOR:

SHP Chemical Inc.
311 West Third Street
Suite 212-2802
Carson City, NV 89703

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

May be fatal if swallowed. Harmful if inhaled. Avoid breathing dust. Wear long-sleeved shirt and long pants, shoes, socks, and chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

USER SAFETY RECOMMENDATIONS: User should wash hands before eating, drinking, using tobacco, or using the toilet. User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Formulators using this product are responsible for obtaining EPA registration for their formulated product.

Only for formulation into an insecticide for the following uses:

- (1) Residential Indoor: Companion Animal
- (2) Uses for which the U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
- (3) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place away from food, drink and animal feeding stuffs. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements). Residual surface material may be removed with towels moistened with methanol.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. When completely empty, offer for recycling, if available, or dispose of liner in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke. If drum is contaminated and cannot be reused, dispose of in the manner required for its liner.

WARRANTY

SHP Chemical Inc. warrants that this product conforms to the chemical description on the label. SHP Chemical Inc. neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, express or implied, concerning this product. To the extent consistent with applicable law, SHP Chemical Inc.'s maximum liability for breach of this warranty shall not exceed the purchase price of the product. To the extent consistent with applicable law, buyer and user acknowledge and assume all risks and liabilities resulting from handling, storage and use of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.

Metzger, Autumn

From: Megha Even <shaheven@gmail.com>
Sent: Wednesday, August 27, 2014 5:25 PM
To: Metzger, Autumn
Cc: Iain Weatherston
Subject: Re: FW: 90057-1 Amended label, data matrix and certification with regards to data citation
Attachments: Imidacloprid Tech label rev 082714.pdf

Hi Autumn.

Attached please find the revised label for 90057-1 with the requested changes.

Let me know if you have any questions.

Have a great long weekend,
Megha Even
J&T Associates LLC

resub
SAS 7302

On Wed, Aug 27, 2014 at 11:57 AM, Iain Weatherston <iweatherston@cox.net> wrote:

Megha:
Here is the e-mail from Autumn Metzger.
Iain

From: "Metzger, Autumn" <Metzger.Autumn@epa.gov>
Date: Wednesday, August 27, 2014 at 4:00 AM
To: Iain Weatherston <iweatherston@cox.net>
Subject: RE: 90057-1 Amended label, data matrix and certification with regards to data citation

Hi Iain,

Venus had a few last comments.

The brand name "Imidacloprid Technical" is taken. She suggested something with a little change like "SHP Imidacloprid Technical" or something

Pg1, Where it says: "See side panel for additional precautionary statements," add "and directions for use" if you plan on having the them on the side panel as well

Pg 2, She would like the "User Safety Recommendations" in a box

Pg 2, the ; after "Companion Animal" should be deleted

Autumn Metzger

Registration Division

Office of Pesticide Programs

U.S. EPA

703-305-5314

From: Iain Weatherston [<mailto:iweatherston@cox.net>]

Sent: Tuesday, August 19, 2014 4:21 PM

To: Metzger, Autumn

Subject: Re: 90057-1 Amended label, data matrix and certification with regards to data citation

Autumn:

I think the majority of people I deal with across IB, IRB, AD and BPPD do in fact notify approval electronically (and in most cases it is followed up with a letter via snail mail). A few, mainly people who have been there a while, and they could be nearly as old as I am still seem to prefer the U.S. Mail.

Iain

From: "Metzger, Autumn" <Metzger.Autumn@epa.gov>

Date: Tuesday, August 19, 2014 at 12:45 PM

To: Iain Weatherston <iweatherston@cox.net>

Subject: RE: 90057-1 Amended label, data matrix and certification with regards to data citation

I have only done these electronically for almost 6 years. I thought everyone was supposed to be now....is that not the case? Let me know who isn't yet (we need to move into the 2000's...☺).

Autumn Metzger

Registration Division

Office of Pesticide Programs

U.S. EPA

703-305-5314

From: Iain Weatherston [<mailto:iweatherston@cox.net>]

Sent: Tuesday, August 19, 2014 3:33 PM

To: Metzger, Autumn

Subject: Re: 90057-1 Amended label, data matrix and certification with regards to data citation

Letter of Issuance and Stamped approved Label

Iain

From: "Metzger, Autumn" <Metzger.Autumn@epa.gov>

Date: Tuesday, August 19, 2014 at 11:56 AM

To: Iain Weatherston <iweatherston@cox.net>

Subject: RE: 90057-1 Amended label, data matrix and certification with regards to data citation

What is an LOI and SAL?

Autumn Metzger

Registration Division

Office of Pesticide Programs

U.S. EPA

703-305-5314

From: Iain Weatherston [<mailto:iweatherston@cox.net>]

Sent: Tuesday, August 19, 2014 2:10 PM

To: Metzger, Autumn

Subject: Re: 90057-1 Amended label, data matrix and certification with regards to data citation

Autumn:

I have asked my colleague Megha Even who is in DC to make the change and send you the modified label this afternoon. Please send the LOI and the SAL to me, preferably as an e-mail attachment .

Thanks,

Iain

From: "Metzger, Autumn" <Metzger.Autumn@epa.gov>

Date: Tuesday, August 19, 2014 at 8:51 AM

To: Iain Weatherston <iweatherston@cox.net>

Subject: RE: 90057-1 Amended label, data matrix and certification with regards to data citation

Iain,

Only one comment, if this product is in lbs then it is a solid and "net contents" should read "net weight." Please send back a pdf version of label once revised.

Thanks!

Autumn Metzger

Registration Division

Office of Pesticide Programs

U.S. EPA

703-305-5314

From: Iain Weatherston [<mailto:iweatherston@cox.net>]

Sent: Saturday, August 16, 2014 12:46 PM

To: Metzger, Autumn

Subject: 90057-1 Amended label, data matrix and certification with regards to data citation

resub 5957301

Autumn:

Please find attached as per your recent e-mails an amended draft label which conforms with Marianne's toxicity review and your edits. Also attached are an up[dated data matrix and Form 8570-34.

If there is anything else that you need just let me know.

Regards,

Iain

Metzger, Autumn

From: Metzger, Autumn
Sent: Tuesday, August 12, 2014 1:28 PM
To: 'Iain Weatherston'
Subject: RE: EPA 90057-R, imidacloprid technical

Iain,

Notice also the comment on the tox memo stating to revise your data matrix with the specific guideline numbers for the acute tox, please submit this with the label. A new offer to pay form with a matching date must also be submitted with it.

Autumn Metzger
Registration Division
Office of Pesticide Programs
U.S. EPA
703-305-5314

From: Iain Weatherston [mailto:iweatherston@cox.net]
Sent: Tuesday, August 12, 2014 11:02 AM
To: Metzger, Autumn
Subject: Re: EPA 90057-R, imidacloprid technical

Autumn:
No problem, I spoke with Cliff Miller and you should have the LOA most likely tomorrow.
Iain

From: "Metzger, Autumn" <Metzger.Autumn@epa.gov>
Date: Tuesday, August 12, 2014 at 7:44 AM
To: Iain Weatherston <iweatherston@cox.net>
Subject: FW: EPA 90057-R, imidacloprid technical

Hi Iain,

I just got your voicemail. To answer your question, The Agency does not keep anything "on record" for each company. That would be a logistical nightmare☺. Each package must be able to support itself and therefore must have everything. In addition, there would be no way of knowing if the company still kept you as an authorized agent (or if they discontinued to use you) or if they used you for this particular submission (as many people use different agents for different things). So, every submission you make for a company requires this. Other people may not have asked it if they didn't realize it was missing.

Autumn Metzger
Registration Division
Office of Pesticide Programs
U.S. EPA
703-305-5314

From: Metzger, Autumn
Sent: Tuesday, August 12, 2014 8:56 AM

To: 'iweatherston@cox.net'

Subject: EPA 90057-R, imidacloprid technical

Hi Ian,

I am working on this product and realized I do not have an LOA from your company authorizing you as their agent. Please have them email me one or send one to me from them. Once I get that I can share the tox and chem memos and label comments and we can move forward with registering. Please have to me asap but no later than the end of this week so we do not run into any time issues since I'll be out a good bit of the next week.

Thanks!

Autumn Metzger
Registration Division
Office of Pesticide Programs
U.S. EPA
703-305-5314



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

DATE OUT: 23 / JULY / 2014

SUBJECT: **PRODUCT CHEMISTRY REVIEW OF MP [X] EP []**
DP BARCODE No.: DP417666 EPA File Symbol No.: 90057-R
PRODUCT NAME: Imidacloprid Technical
COMPANY: SHP Chemical Inc.
FOOD USE [No] **INTEGRATED FORMULATION [X]**
PCC: 129099 Decision No. 484500
ACTION CODE: R333 Pesticidal use: Insecticide

FROM: Hari Mukhoty, DVM, PhD
Product Chemistry Team
Technical Review Branch / RD (7505P)

Handwritten: SHP 7-29/14

TO: Autumn Metzger, RMR / Venus Eagle, RM 01
Insecticide Branch / RD (7505P)

INTRODUCTION:

The Registrant has submitted a basic CSF (dated: 10/04/2013) for a proposed TGAI /MP, and has also proposed a product specific label for registration of the aforesaid product under EPA File symbol No: 90057-R. The product chemistry data have been submitted under MRIDs: 492465-01, -02 and -03.

The aforesaid MP is manufactured by [REDACTED] for the SHP Chemical Inc. in NV. USA.

Label text indicates that this proposed MUP is intended to be formulated into end-use products with no food uses.

TRB has been requested to evaluate the product chemistry data required for the registration of the proposed MP.

SUMMARY OF FINDINGS:

1. The proposed TGAI / MP contains the active ingredient: Imidacloprid (99.16%).
2. The overall mean of the active ingredients from the five batch analysis is 99.157% [MRID: 492465-02, Page 13].

DP BARCODE No.: 417666 **EPA File Symbol No.:** 90057-R **PRODUCT NAME:** Imidacloprid Technical

3. The proposed nominal concentration of the active ingredient in the MUP is 99.16%. The nominal concentration of the active ingredient matches with the label claim. This is in compliance with PR Notice 91-2. The certified limits of the active and inert ingredients have been proposed by the registrant and are in compliance with 40 CFR § 158.350 (c) (2) MRID: 492465-01, page CA 8 / stated in the proposed CSF].

4. This CSF has been reviewed by I.I.A. Branch on 11/19/2013 and they have concluded that it contains active ingredient and impurities only.

5. The product chemistry data submitted for Group A corresponding to guidelines 830.1550 (product identity and composition), 830.1600 (description of materials used to produce the product), 830.1620 (description of production process), 830.1670 (discussion of formation of impurities), 830.1750 (certified limits) satisfy the product chemistry data requirements of 40 CFR § 158.320, 158.325, 158.330, 158.340, and 158.350 respectively for the proposed formulation [MRID: 492465-01 & -02].

[MRID: 492465-02].

The method to determine content of Imidacloprid Technical was validated [MRID: 492465-02, page 14].

Similar analytical techniques can also be applied for Enforcement Analytical Method with data validation.

7. Product chemistry Group A and Group B data, with the exception of Storage Stability (830.6317) and Corrosion Characteristics (830.6320) data requirements are satisfied [MRIDs: 492465-03].

CONCLUSIONS:

1. TRB has reviewed the basic CSF (dated: 10/04/2013) for the proposed TGAI/ MP and has found it to be acceptable.

2. Group A data and Group B data, with the exception of Storage Stability (830.6317) and Corrosion Characteristics (830.6320) data requirements are satisfied and acceptable.

3. The proposed label was screened as it pertains to the product chemistry requirements. The final review of the proposed label and uses are the purview of the PM team.

Manufacturing process information may be entitled to confidential treatment

DP BARCODE No.: 417666 **EPA File Symbol No.:** 90057-R **PRODUCT NAME:** Imidacloprid Technical

PRODUCT CHEMISTRY DATA (SERIES 830 Group A)

Group A	Data Required Fulfilled	MRID No.
830.1550. Chemical Identity (same as in Product CSF dated 10/04/2013)	A	492465-01
830.1600. Beginning Materials	A	"
830.1620. Production process	A	"
830.1650. Formulation process	Not required	
830.1670. Discussion of Impurities	A	"
830.1700. Preliminary Analysis	A	492246-02
830.1750. Certified Limits	A	492465-01; see also the CSF
830.1800. Enforcement Analytical Method #	A	"

A = Acceptable NA = Not Acceptable G = data gap

Analytical Method: HPLC method using UV/Vis and mass spectroscopy were used to quantify and identify the active ingredients and impurities. [REDACTED] also determined. Validation of HPLC method was also done.

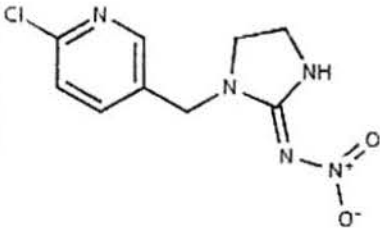
Identity of the Imidacloprid Technical

CONFIDENTIAL APPENDIX

830.1550 PRODUCT IDENTITY AND COMPOSITION

MRID: 492465-01

Imidacloprid Technical consists of the active ingredient and related impurities characterized below.

Active Ingredient:	1-(6-chloro-3-pyridinylmethyl)-N-nitroimidazolidin-2-ylideneamine
Common Name:	Imidacloprid (ISO)
CAS No.:	138261-41-3
Structural Formula:	
Empirical Formula:	C ₉ H ₁₀ ClN ₅ O ₂
Molecular Weight:	255.7
Nominal Concentration:	99.16%
Upper Certified Limit:	100.00%
Lower Certified Limit:	96.19%

DP BARCODE No.: 417666 EPA File Symbol No.: 90057-R PRODUCT NAME: Imidacloprid Technical

Table 2: Physical and Chemical Properties of: Imidacloprid Technical				
GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	Color	492465-03	A	Colorless to Off-White
830.6303	Physical state	"	A	Crystalline powder - solid
830.6304	Odor	"	A	Slight, characteristics odor.
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	"	A	Stable under recommended storage and handling conditions. Product is not expected to come in contact metal & metal ions and will not be subjected to temperatures > 60° C.
830.6314	Oxidation/reduction: chemical incompatibility	"	A	Does not contain an oxidizer.
830.6315	Flammability	"	A	It is solid.
830.6316	Explosibility	"	A	Not considered explosive.
830.6317	Storage stability		I	In progress.
830.6319	Miscibility		A	Product is solid. Not to be diluted with Petroleum solvent.
830.6320	Corrosion characteristics		I	In progress.
830.7000	pH	"	A	4.21
830.7050	UV/Visible absorption	"	A	249 nm at pH 7.0y
830.7100	Viscosity	"	A	Product is solid
830.7200	Melting point	"	A	143-144 ° C
830.7220	Boiling point		A	It is a solid
830.7300	Density	"	A	1.54 g/cm ²
830.7370	Dissociation constants in water (DC)	"	A	pKa of amine = 11.12
830.7550	Partition coefficient	"	A	Log K _{ow} -0.57 at 20 °C
830.7840	Water solubility	"	A	-0.61 g/L at 20° C
830.7950	Vapor pressure	"	A	3 x 10 ⁻¹² mm Hg @ 20°C
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress ; U = Up-grade (additional information required); W = waivers				

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

SIMILARITY CLINIC MEMORANDUM:

Subject: EPA Reg. No.: 90057-R/Imidacloprid Technical
DP Barcode: 416290
PC Code: 129099

From: Marianne Lewis, Biologist
Insecticides/Rodenticides Branch
Registration Division (7505P)

Marianne Lewis
11/22/13

To: Venus Eagle, PM 1
Insecticide Rodenticide Branch
Registration Division (7505P)

Applicant: SHP Chemical, Inc.
311 West Third Street, Suite 212-2802
Carson City, NV 89703

FORMULATION FROM EPA Reg. No. 90057-R LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Imidacloprid:	99.16%
<u>Inert Ingredient(s):</u>	0.84%
Total	100.00%

BACKGROUND: The registrant is doing a 'cite all' for the acute toxicity study requirements to support the registration of their new product, EPA Reg. No. 90057-R. Based on the data, the following acute toxicity categories will be assigned to the subject product: acute oral (81-1) – II; acute dermal (81-2) – IV; acute inhalation (81-3) – III; primary eye irritation (81-4) – IV; primary skin irritation (81-5) – IV; skin sensitization (81-6) – non sensitizer.

RECOMMENDATIONS:

- The subject product will be assigned the Toxicity Categories listed above to support the registration of EPA Reg. 90057-R.

The acute toxicity profile for EPA Reg. No. 90057-R is currently:

Acute Oral	II
Acute Dermal	IV
Acute Inhalation	III
Primary Eye	IV
Primary Dermal	IV
Skin sensitization	non sensitizer

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 090057-R IMIDACLOPRID TECHNICAL

SIGNAL WORD: **WARNING** **AVISO**

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

May be fatal if swallowed. Harmful if inhaled. Avoid breathing dust. Wear long sleeved shirt and long pants, shoes and socks.

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

SHP Chemical Inc.

August 12, 2011

Autumn Metzger
U.S. EPA-OPP-RD
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460-0001

Subject: Notification of Authorized Agent (40cfr 152.122(b))

Company: SHP Chemical inc.

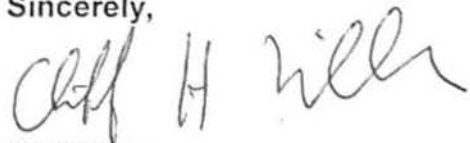
Dear Ms. Metzger:

By this letter I wish to notify the Agency, as required by 40 CFR 152.122(B) that Dr. Iain Weatherston of J&T Associates LLC., 4061 North 156th Drive, Goodyear, AZ 85395 is the authorized agent for SHP Chemical Inc.

Dr. Weatherston is authorized to act on the behalf of SHP Chemical Inc., in all matters before the EPA pertaining to registration of ectoparasiticide end-use products. All correspondence and other communications should be directed to Dr Weatherston.

I thank you for your assistance in this matter. Should there be any questions, or if further information is required do not hesitate to contact me.

Sincerely,



Cliff Miller
CEO
702-445-4114

(702)445-4114, Fax (702) 885-3221 311 West Third Steeet, Suite 212-2808, Carson, City, NV 89703.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 06, 2013

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

J&T ASSOCIATES, LLC
SHP CHEMICAL INC
4061 NORTH 156TH DRIVE
GOODYEAR, AZ 85395

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 01-NOV-13. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 11-1-13

Experts In-Processing Signature: B.B.

Date 11-5-13

Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>90057-R</u>		EPA Receipt Date: <u>11-1-13</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			<input checked="" type="checkbox"/>		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			<input checked="" type="checkbox"/>		
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)		yes	no		
	<u>* No inerts to review</u>					
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>		
	Certificate and data matrix consistent			<input checked="" type="checkbox"/>		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)		yes	no		
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)					<input checked="" type="checkbox"/>
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>		
5	a) Selective Method (Fee category experts use)		yes	no		
	b) Cite-All (Fee category experts use)		<input checked="" type="checkbox"/>			
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of <u>Label</u> (Electronic labels on CD are encouraged and guidance is available)			<input checked="" type="checkbox"/>		
7	Is the data package consistent with PR Notice 86-5			<input checked="" type="checkbox"/>		
8	Notice of Filing included with petitions					<input checked="" type="checkbox"/>

9	If applicable for conventional applications, <u>reduced risk rationale</u>				X
10	<u>Required Data</u> and/or data waivers. See Footnote C.				
	a) List study (or studies) not included with application				

Comments:

- * Submitted studies PASSED PRN 11-3 review
- * Technical + impurities only — no inerts to review
- * Jacket PASSED

46

MRID: 412465

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the [inert Web site](#) and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the [Chief of Microbial Pesticides Branch](#).

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 5, 2013

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-484500
EPA File Symbol or Registration Number: 90057-R
Product Name: IMIDACLOPRID TECHNICAL
EPA Receipt Date: 01-Nov-2013
EPA Company Number: 90057
Company Name: SHP CHEMCIAL INC

DR. IAIN WEATHERSTON
J&T ASSOCIATES, LLC
SHP CHEMCIAL INC
4061 NORTH 156TH DRIVE
GOODYEAR, AZ 85395-

SUBJECT: Receipt of Application and 75% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has received your application, 75% small business waiver request, and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R333

NEW PRODUCT;MUP OR END USE PRODUCT WITH UNREGISTERED SOURCE OF THE
ACTIVE INGREDIENT;REQUIRES SCIENCE DATA REVIEW;NEW PHYSICAL FORM;CITE-ALL
OR SELECTIVE DATA CITATION WHERE APPLICANT OWNS ALL REQUIRED DATA:

Your request for waiver has been forwarded for review. You will be notified in writing when a determination is made regarding your request. If your waiver request is approved, the decision review time period will start on the date of approval. If your waiver request is denied, you will receive an invoice for the outstanding balance.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

A handwritten signature in black ink, appearing to be "m. zhu", is written over the word "Sincerely,".

Front End Processing Staff
Information Technology & Resources Management Division

my

Fee for Service

{943097E~

This package includes the following

- ☒ New Registration
- ☐ Amendment

☒ Studies? ☒ Fee Waiver?

☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 1

Receipt No.

S-

943097

EPA File Symbol/Reg. No.

90057-R

Pin-Punch Date:

11/1/2013

☐ This item is NOT subject to FFS action.

Action Code:

Requested: R333

Granted: R333

Amount Due: \$ 18,893

Parent/Child Decisions:

☒ Inert Cleared for Intended Use



Uncleared Inert in Product

Reviewer: Jennifer Phines

Date: 11/5/13

Remarks:

Receipt for Section 3

S: 943097

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☒ Yes ☐ No

Application Type: New Registration

Billable: ☒ Yes ☐ No

Company: 90057 SHP CHEMICAL INC ☒


Risk Manager: Registration Division, Risk Management Team 1

Product #: 90057-R Product Name: IMIDACLOPRID TECHNICAL

Override#:

Me Too Section3: 84229-16 Me Too Product Name: TIDE TECHNICAL IMIDACLOPRID

Application Date: 04-Oct-2013  OPP Rec'd Date: 01-Nov-2013 

Front End Date: 04-Nov-2013  Risk Manager Send Date: 

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

Application for new registration

New Ingredient Request Date:

New Ingredient Received Date:

Form A: ☐ Signature Date:

Form B: ☐ Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Study
CSF

View/Edit

Pay.gov - Online Payment

Page 1 of 1

Online Payment

Step 3: Confirm Payment

1 | 2 | 3

Thank you.

Your transaction has been successfully completed.

Pay.gov Tracking Information

Application Name: PRIA Service Fees

Pay.gov Tracking ID: 25CVA4D8

Agency Tracking ID: 74523677098

Transaction Date and Time: 10/30/2013 17:01 EDT

Payment Summary

Account Holder Name: J&T Associates LLC

Payment Amount: \$4,724.00

Account Type: Business Checking

Routing Number: 122100024

Account Number: *****6224

Payment Date: 10/31/2013

Decision Number:

Registration Number: 90057-R

Company Name: SHP Chemical Inc.

Company Number: 90057

Action Code: R333



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 90057-R	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SHP Chemical Inc./ IMIDACLOPRID TECHNICAL	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) SHP Chemical Inc. 311 West Third Street, Suite 212-2802 Carson City, NV 89703 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 84229-16 Product Name Tide Technical Imidacloprid	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

PRIA Category R333

Pay.gov Tracking ID: _____

Agency Tracking ID: _____

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 55 lbs (25 kg), 220 lbs (100 kg), 440 lbs (200 kg), 551 lbs (250 kg)	
		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name IAIN WEATHERSTON	Title Consultant to SHP Chemical Inc.	Telephone No. (Include Area Code) 523-535-4055	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment, or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Consultant to SHP Chemical Inc.		
4. Typed Name IAIN WEATHERSTON	5. Date October 4, 2013		

J&T Associates LLC

Iain Weatherston Ph.D.
Director
823-217-9013 / 623-535-4055
E-mail: iweatherston@cox.net

Venus Eagle, Product Manager (1)
U.S. EPA – OPP [7505-P]
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

October 4, 2013

SUBJECT: Application to Register Imidacloprid Technical

COMPANY: SHP Chemical Inc.
311 West Third Street, Suite 212-2802
Carson City, NV 89703

CONTACT: Iain Weatherston, Ph.D, J&T Associates LLC
[contact information as per letterhead]

PRIA CATEGORY: R333

PRODUCT: Imidacloprid Technical [EPA File Symbol 90057-R]

Dear Ms. Eagle:

As agent for, and on behalf of SHP Chemical Inc., I submit for your review and approval an application to register Imidacloprid Technical. Product chemistry data are submitted herein. SHP Chemical Inc. has opted to support all other data requirements by using the "cite-all" method.

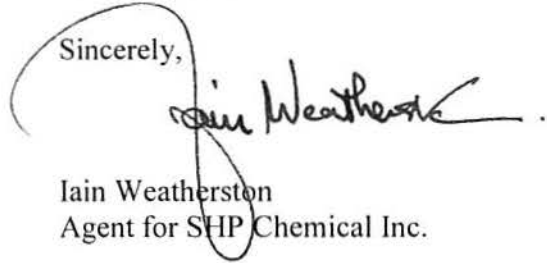
SHP Chemical Inc. is also claiming that their product is substantially similar in composition and labeling to Tide Technical Imidacloprid with EPA Registration Number 84229-16.

In addition to this letter, the Administrative Volume [Volume 90057-R-1] of this application contains:

- A fully executed application for pesticide registration [8570-1]
- A fully executed certification with respect to data citation [8570-34]
- Fully executed "data matrices" [8570-35], including names and addresses of companies sent "offer-to-pay" letters
- Draft label (1 copy bound into the volume and one copy on CD-ROM)
- Confidential Statement of Formula [8570-4]

Should you have any questions or further information is required, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Iain Weatherston", with a large, sweeping loop at the beginning.

Iain Weatherston
Agent for SHP Chemical Inc.

TRANSMITTAL DOCUMENT

NAME & ADDRESS OF APPLICANT

SHP Chemical Inc.
311 West Third Street
Suite 212-2802
Carson City, NV 89703

REGULATORY ACTION IN SUPPORT OF WHICH THIS PACKAGE IS SUBMITTED

APPLICATION TO REGISTER IMIDACLOPRID TECHNICAL
A MANUFACTURING USE PRODUCT

TRANSMITTAL DATE

November __, 2013

LIST OF SUBMITTED MATERIAL

VOLUME 90057-R-1	Administrative Volume: Correspondence, Application, Forms, Label and Confidential Statement of Formula
49246501 VOLUME 90057-R-2	Product Chemistry: Group A
49246502 VOLUME 90057-R-2S	Preliminary Analysis
49246503 VOLUME 90057-R-3	Product Chemistry: Group B

PRIA INFORMATION

PRIA Category R333

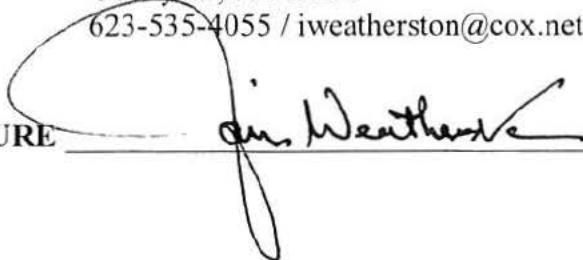
Pay.gov Tracking ID 25CVA4D8

Agency Tracking ID 74523677098

COMPANY AGENT/CONTACT

Iain Weatherston, Ph.D.
J&T Associates, LLC
4061 North 156th Drive
Goodyear, AZ 85395
623-535-4055 / iweatherston@cox.net

AGENT SIGNATURE



DATE Oct 31, 2013

TRANSMITTAL DOCUMENT

NAME & ADDRESS OF APPLICANT

SHP Chemical Inc.
311 West Third Street
Suite 212-2802
Carson City, NV 89703

REGULATORY ACTION IN SUPPORT OF WHICH THIS PACKAGE IS SUBMITTED

APPLICATION TO REGISTER IMIDACLOPRID TECHNICAL
A MANUFACTURING USE PRODUCT

TRANSMITTAL DATE

November __, 2013

LIST OF SUBMITTED MATERIAL

VOLUME 90057-R-1	Administrative Volume: Correspondence, Application, Forms, Label and Confidential Statement of Formula
VOLUME 90057-R-2	Product Chemistry: Group A
VOLUME 90057-R-2S	Preliminary Analysis
VOLUME 90057-R-3	Product Chemistry: Group B

PRIA INFORMATION

PRIA Category R333

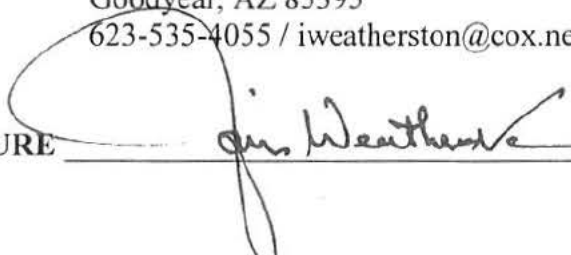
Pay.gov Tracking ID 25CVA4D8

Agency Tracking ID 74523677098

COMPANY AGENT/CONTACT

Iain Weatherston, Ph.D.
J&T Associates, LLC
4061 North 156th Drive
Goodyear, AZ 85395
623-535-4055 / iweatherston@cox.net

AGENT SIGNATURE



DATE Oct 31, 2013



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number
Star Business Products Inc, 115 Green View Dr, Madison, MS 39110/623-535-4055 (Agent)

EPA Registration Number/File Symbol
90057-R

Active Ingredient(s) and/or representative test compound(s)

Imidacloprid [129099]

Date

August 15, 2014

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)

Residential Indoor

Product Name

IMIDACLOPRID TECHNICAL

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

(Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements)

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature


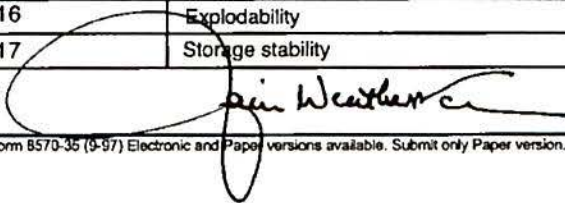
Date

Aug 15, 2014

Typed or Printed Name and Title

Iain Weatherston, Agent to SHP Chemical Inc

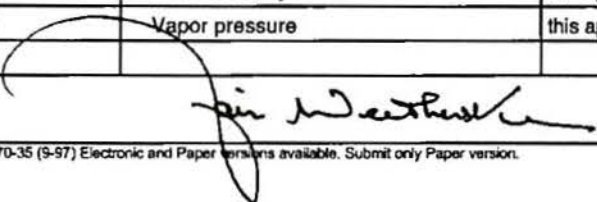


		UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460		Form Approved OMB No. 2070-0060	
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DATA MATRIX					
Date August 15, 2014			EPA Reg No./File Symbol 90057-R	Page 1 of 9	
Applicant's/Registrant's Name & Address SHP Chemical Inc., 311 West Third St, Ste 212-2802, Carson City, NV 89703			Product IMIDACLOPRID TECHNICAL		
Ingredient Imidacloprid [129099]					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product identity and disclosure of ingredients	this application	SHP Chemical Inc.	Own	
830.1600	Description of starting materials used to produce product	this application	SHP Chemical Inc.	Own	
830.1620	Description of production process	this application	SHP Chemical Inc.	Own	
830.1670	Discussion of formation of impurities	this application	SHP Chemical Inc.	Own	
830.1700	Preliminary analysis	this application	SHP Chemical Inc.	Own	
830.1750	Certified limits	this application	SHP Chemical Inc.	Own	
830.1800	Enforcement analytical method	this application	SHP Chemical Inc.	Own	
830.6302	Color	this application	SHP Chemical Inc.	Own	
830.6303	Physical state	this application	SHP Chemical Inc.	Own	
830.6304	Odor	this application	SHP Chemical Inc.	Own	
830.6313	Stability to temperature and metals, metal ions	this application	SHP Chemical Inc.	Own	
830.6314	Oxidation/reduction - chemical compatibility	this application	SHP Chemical Inc.	Own	
830.6315	Flammability	this application	SHP Chemical Inc.	Own	
830.6316	Explosibility	this application	SHP Chemical Inc.	Own	
830.6317	Storage stability	in progress	SHP Chemical Inc.	Own	
Signature 			Name and Title Iain Weatherston, Agent to SHP Chemical Inc.		Date Aug 15, 2014

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

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DATA MATRIX					
Date August 15, 2014		EPA Reg No./File Symbol 90057-R	Page 2 of 9		
Applicant's/Registrant's Name & Address SHP Chemical Inc., 311 West Third St, Ste 212-2802, Carson City, NV 89703		Product IMIDACLOPRID TECHNICAL			
Ingredient Imidacloprid [129099]					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6319	Miscibility	this application	SHP Chemical Inc.	Own	
830.6320	Corrosion characteristics	in progress	SHP Chemical Inc.	Own	
830.6321	Dielectric breakdown constant	this application	SHP Chemical Inc.	Own	
830.7000	pH	this application	SHP Chemical Inc.	Own	
830.7050	UV/Visible absorption	this application	SHP Chemical Inc.	Own	
830.7100	Viscosity	this application	SHP Chemical Inc.	Own	
830.7200	Melting point/range	this application	SHP Chemical Inc.	Own	
830.7220	Boiling point/range	this application	SHP Chemical Inc.	Own	
830.7300	Density, specific gravity	this application	SHP Chemical Inc.	Own	
830.7370	Dissociation constant	this application	SHP Chemical Inc.	Own	
830.7520	Particle size, fiber length & diameter distribution	this application	SHP Chemical Inc.	Own	
830.7550	Partition coefficient	this application	SHP Chemical Inc.	Own	
830.7840	Water solubility	this application	SHP Chemical Inc.	Own	
830.7950	Vapor pressure	this application	SHP Chemical Inc.	Own	
Signature 		Name and Title Iain Weatherston, Agent to SHP Chemical Inc.		Date Aug 15, 2014	

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Form Approved OMB No. 2070-0060

DATA MATRIX

Page 3 of 9

Product

IMIDACLOPRID TECHNICAL

[illegible]

Name and Title

Date _____

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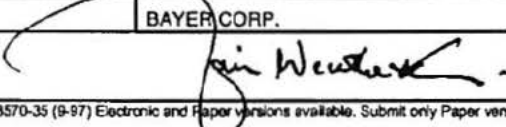


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DATA MATRIX

Date August 15, 2014		EPA Reg No./File Symbol 90057-R		Page 4 of 9	
Applicant's/Registrant's Name & Address SHP Chemical Inc., 311 West Third St, Ste 212-2802, Carson City, NV 89703		Product IMIDACLOPRID TECHNICAL			
Ingredient Imidacloprid [129099]					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	ALL OTHER GUIDELINE REQUIREMENTS		*CITE-ALL* METHOD OF DATA SUPPORT		
COMPANY NUMBER	COMPANY NAME		ADDRESS, CITY	STATE	ZIP
100	SYNGENTA CROP PROTECTION, LLC		POB 18300, 410 Swing Road, Greensboro	NC	27419
228	NUFARM AMERICAS, INC.		4020 Aerial Center Pkwy, Ste 103, Morrisville	NC	27560
239	THE SCOTTS COMPANY		PO Box 190, Marysville	OH	43040
264	BAYER CROPSCIENCE LP		POB 12014, 2 TW Alexander Dr, RTP	NC	27709
279	FMC CORP AGRICULTURAL PRODUCTS GROUP		1735 Market St, Rm 1978, Philadelphia	PA	19103
400	CHEMTURA CORPORATION		199 Benson Road, Middlebury	CT	06749
432	BAYER ENVIRONMENTAL SCIENCE		POB 12014, 2 TW Alexander Drive, RTP	NC	27709
538	THE SCOTTS COMPANY		14111 Scottslawn Road, Marysville	OH	43041
1001	CLEARY CHEMICALS, LLC		4020 Aerial Center Pkwy, Ste 101, Morrisville	NC	27560
1021	MCLAUGHLIN GORMLEY KING CO.		8810 Tenth Ave North, Minneapolis	MN	55427
2217	PBI/GORDON CORPORATION		POB 014090, 1217 W.12th St, Kansas City	MO	64101
3008	OSMOSE INC.		980 Ellicott Street, Buffalo	NY	14209
3125	BAYER CORP.		POB 4913, 8400 Hawthorn Rd, Kansas City	MO	64120
Signature 			Name and Title Iain Weatherston, Agent to SHP Chemical Inc.		Date Aug 15, 2014

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

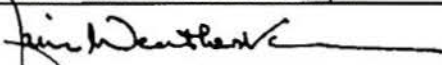


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401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date August 15, 2014		EPA Reg No./File Symbol 90057-R		Page 5 of 9	
Applicant's/Registrant's Name & Address SHP Chemical Inc., 311 West Third St, Ste 212-2802, Carson City, NV 89703		Product IMIDACLOPRID TECHNICAL			
Ingredient Imidacloprid [129099]					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
5905	HELENA CHEMICAL CO.		7664 Smythe Farm Road, Memphis	TN	38120
7501	GUSTAFSON LLC		PO Box 660065, Dallas	TX	75266
7946	JJ MAUGET CO.		12733 Director's Loop, Woodbridge	VA	22192
9198	THE ANDERSONS LAWN FERTILIZER DIV.		POB 119, 521 Illinois Ave, Maumee	OH	43537
10465	CHEMICAL SPECIALTIES INC.		PO Box 1330, Harrisburg	NC	28075
11556	BAYER HEALTHCARE LLC		PO Box 390, Shawnee Mission	KS	66201
33657	MITSUI CHEMICALS, INC.		PO Box 5126, Valdosta	GA	31603
34704	LOVELAND PRODUCTS, INC.		PO Box 1286, Greeley	CO	80632
35935	NUFARM LIMITED		4020 Aerial Center Pkwy, Ste 101, Morrisville	NC	27560
39967	LANXESS CORPORATION		111 Ridc Park West Drive, Pittsburg	PA	15275
42750	ALBAUGH INC.		PO Box 2127, Valdosta	GA	31064
43419	AEROXON INC.		2125 Center Ave, Ste 507, Fort Lee	NJ	07024
53883	CONTROL SOLUTIONS, INC.		5903 Genoa-Red Bluff Road, Pasadena	TX	77507
55146	NUFARM AMERICAS, INC.		4020 Aerial Center Pkwy, Ste 101, Morrisville	NC	27560
66222	MAKHTESHIM AGAN OF NORTH AMERICA, INC.		3120 Highwoods Blvd, Ste 100, Raleigh	NC	27604
Signature 			Name and Title Iain Weatherston, Agent to SHP Chemical Inc.		Date Aug 15, 2014

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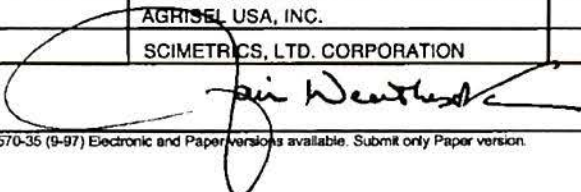


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401 M Street, S.W.
WASHINGTON, D.C. 20460

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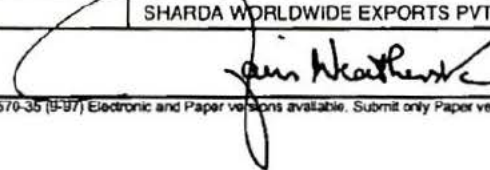
DATA MATRIX

Date August 15, 2014		EPA Reg No./File Symbol 90057-R		Page 6 of 9	
Applicant's/Registrant's Name & Address SHP Chemical Inc., 311 West Third St, Ste 212-2802, Carson City, NV 89703		Product IMIDACLOPRID TECHNICAL			
Ingredient Imidacloprid (129099)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
66607	SPRAY DRIFT TASK FORCE		1900 K Street NW, Washington	DC	20006
67760	CHEMINOVA, INC.		1600 Wilson Blvd, Ste 700, Arlington	VA	22209
68467	MYCOGEN SEEDS		9330 Zionsville Road, Indianapolis	IN	46268
69117	ARBORSYSTEMS, INC.		8203 West 20th St, Ste A, Greeley	CO	80634
69332	PET LOGIC, LLC		PO Box 540224, Omaha	NE	68130
69361	REPAR CORP.		1050 Conn Ave NW, Ste 1000, Washington	DC	20036
70506	UNITED PHOSPHORUS, INC.		630 Freedom Bus.Ctr. Ste 402, King of Prussia	PA	19406
70905	SULPHUR MILLS, LTD		1629 Pollasky Ave, Ste 111, Clovis	CA	93612
71368	NUFARM, INC.		4020 Aerial Ctr Pkwy, Ste 1013, Morrisville	NC	27560
71512	ISK BIOSCIENCES CORPORATION		7470 Auburn Road, Ste A, Concord	OH	44077
71754	OUTDOOR RESIDENTIAL EXPOSURE TASK FORCE		1350 I Street NW, Washington	DC	20005
71755	AGRICULTURAL REENTRY TASK FORCE		1350 I Street NW, Washington	DC	20005
72155	BAYER ADVANCED		POB 12014, 2 TW Alexander Dr, RTP	NC	27709
72159	AGRISIL USA, INC.		115 Obtuse Hill Road, Brookfield	CT	06804
72500	SCIMETRICS, LTD. CORPORATION		PO Box 1045, Wellington	CO	80549
Signature 			Name and Title Iain Weatherston, Agent to SHP Chemical Inc.		Date Aug 15, 2014

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Date August 15, 2014			EPA Reg No./File Symbol 90057-R	Page 7 of 9		
Applicant's/Registrant's Name & Address SHP Chemical Inc., 311 West Third St, Ste 212-2802, Carson City, NV 89703			Product IMIDACLOPRID TECHNICAL			
Ingredient Imidacloprid [129099]						
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
72616	ZELAM LTD.		17220 Westview Rd, Lake Oswego	OR	97034	
73079	ROCKWELL LABORATORIES, LTD.		1257 Bedford Ave, North Kansas City	MO	64116	
73154	SAPSTAIN INDUSTRY GROUP (SIG)		1125 Trenton-Harbourton Rd, Titusville	NJ	09560	
73748	UNIVAR ENVIRONMENTAL SCIENCES		115 Obtuse Hill Road, Brookfield	CT	06804	
73766	INNOVATIVE PEST CONTROL PRODUCTS		PO Box 880216, Boca Raton	FL	33488	
73989	FIFRA ENDANGERED SPECIES TASK FORCE		1350 I Street NW, Washington	DC	20005	
74578	ARBORJET, INC.		12510 Prosperity Dr, Ste 160, Silver Spring	MD	20904	
74779	RAINBOW TREECARE SCIENTIFIC ADVANCEMENT		11571 K-Tel Drive, Minnetonka	MN	55343	
74888	RESIDENTIAL EXPOSURE JOINT VENTURE		900 17th Street NW, Ste 300, Washington	DC	20006	
75234	AGRICULTURAL HANDLERS EXPOSURE TASK FORCE		POB 509, 1720 Prospect Drive, Macon	MO	63552	
75506	ARCH TREATMENT TECHNOLOGIES, INC.		5660 New Northside Dr, Ste 1100, Atlanta	GA	30328	
79676	GRO-PRO, LLC		4110 136th St NW, Gig Harbor	WA	98332	
81598	ROTAM LIMITED		PO Box 649, Hockessin	DE	19707	
81959	ETIGRA LLC		4110 136th St NW, Gig Harbor	WA	98332	
82633	SHARDA WORLDWIDE EXPORTS PVT. LTD.		PO Box 640, Hockessin	DE	19707	
Signature 			Name and Title Iain Weatherston, Agent to SHP Chemical Inc.		Date Aug 15, 2014	

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Applicant's/Registrant's Name & Address

SHP Chemical Inc., 311 West Third St, Ste 212-2802, Carson City, NV 89703

Product

IMIDACLOPRID TECHNICAL

Ingredient Imidacloprid [129099]

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
82957	ENSYSTEX III, INC.		4110 136th St NW, Gig Harbor	WA	98332
83100	ROTAM AGROCHEMICAL COMPANY		PO Box 640, Hockessin	DE	19707
83222	DIRECT AG SOURCE, LLC		115 Obtuse Hill Road, Brookfield	CT	06804
83399	CEVA ANIMAL HEALTH, LLC		8735 Rosehill Road, Lenexa	KS	66215
83529	SHARDA USA LLC		PO Box 640, Hockessin	DE	19707
83558	CELSIUS PROPERTY BV, AMSTERDAM		3120 Highwoods Blvd, Ste 100, Raleigh	NC	27604
83851	AMTIDE, LLC		21 Hubble, Irvine	CA	92618
83923	ENSYSTEX IV, INC.		4110 136th St NW, Gig Harbor	WA	98332
83997	VIANCE, LLC		200 E. Woodlawn Rd, Ste 350, Charlotte	NC	28217
84013	DALIAN CHEMPHY CHEMICALS CO., LTD.		1150 18th St NW, Ste 1000, Washington	DC	20036
84653	GENERIC ENDANGERED SPECIES TASK FORCE		4110 136th St NW, Gig Harbor	WA	98332
84930	ARCANA, LLC		1966 W. 15th St, Ste 6, Loveland	CO	80538
85317	ABAMAX CHEMICAL LLC		POB 640, 7460 Lancaster Pike #9, Hockessin	DE	19707
87290	WILLOWOOD LLC		4110 136th St NW, Gig Harbor	WA	98332
88544	WILLOWOOD IMIDACLOPRID, LLC		PO Box 640, Hockessin	DE	19707

Signature

Name and Title

Iain Weatherston, Agent to SHP Chemical Inc.

Date

Aug 15, 2014

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Product

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IMIDACLOPRID TECHNICAL

Ingredient	Imidacloprid [129099]
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[illegible]

Signature _____

Name and Title

Iain Weatherston, Agent to SHP Chemical Inc.

[illegible]

Aug 15, 2014

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